November 15, 2001

Rick Bossingham
Wabash National Corporation (East Plant)
3460 McCarty Lane,
Lafayette, Indiana 47905

Re: 157-14836-00089
First Minor Permit Revision to
MSOP 157-10976-00089

Dear Mr. Bossingham:

Wabash National Corporation (East Plant) was issued a minor source operating permit on January 25, 2000 for truck and trailer manufacturing plant. A letter requesting a revision to this permit was received on September 7, 2001. Pursuant to the provisions of 326 IAC 2-6.1-6(g), a minor permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The proposed changes include the following:

(a) Paint Booth PB2S:

The proposed changes to paint booth PB2S include:

(1) transferring the booth from Building 7 to Building TDS,
(2) changing the parts coated from pup trailer parts to refurbished chasis trailer parts,
(3) changing the coatings to ZPG1017-OWNF and ZPG-20059, and
(4) increasing the amount of parts coated from 0.41 trailer units per hour to 0.83 units per hour.

(b) Paint Booth PB1S:

The proposed change to paint booth PB1S includes decreasing the amount of pup trailer parts coated in paint booth PB1S from 1.25 trailer units per hour to 1.04 trailer units per hour.

Pursuant to 326 IAC 2-6.1-6, the minor source operating permit shall be revised by incorporating the minor permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this permit revision which includes this letter, the attached operating conditions applicable to these emission units, and revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Scott Fulton, at OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Scott Fulton, or extension 3-5691, or dial (317) 233-5691.

Sincerely,

Original Signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
SDF
cc: File - Tippecanoe County
U.S. EPA, Region V
Tippecanoe County Health Department
Air Compliance Section Inspector - Eric Courtright
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

NEW SOURCE CONSTRUCTION PERMIT
and MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR QUALITY

Wabash National Corporation (East Plant)
3460 McCarty Lane
Lafayette, Indiana 47905

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 157-10976-00089	Date Issued: January 25, 2000

First Significant Permit Revision No.: 157-12806-00089	Date Issued: December 13, 2000

First Minor Permit Revision No.: 157-14836-00089	Affected Pages: 3 and 13
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: November 15, 2001

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates truck trailer manufacturing plant**.**

Authorized Individual:	Mr. Rick Bossingham, Corporate Environmental Manager
Source Address:	3460 McCarty Lane , Lafayette, Indiana 47905
Mailing Address:	P.O.Box 6129, Lafayette, Indiana 47905
Phone Number:	(765) 771-5427
SIC Code:	3715
County Location:	Tippecanoe
County Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD Rules;

A.2 Emissions units and Pollution Control Equipment Summary

This source is approved to construct and operate the following emissions units and pollution control devices:

(a) one (1) paint booth identified as PB1S, with a maximum capacity of 1.04 trailer units per hour, with a maximum usage of white paint, gray paint , undercoating, and the solvent of 0.50, 0.50, 3.00, and 0.04 gallons per unit, respectively. The application method is by airless air atomization spray guns. The particulate matter from the over spray are controlled by panel filters, exhausting to a stack PB1; and

(b) one (1) paint booth identified as PB2S, with a maximum capacity of 0.83 trailer units per hour, with a maximum usage of chasis coatings ZPG-1017-OWNF and ZPG-20059 of 4.5 and 1.00 gallons per unit, respectively. The application method is by airless air atomization spray guns. The particulate matter from the over spray are controlled by panel filters, exhausting to a stack PB2.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

(a) one (1) paint booth identified as PB1S, with a maximum capacity of 1.04 trailer units per hour, with a maximum usage of white paint, gray paint , undercoating, and the solvent of 0.50, 0.50, 3.00, and 0.04 gallons per unit, respectively. The application method is by airless air atomization spray guns. The particulate matter from the over spray are controlled by panel filters, exhausting to a stack PB1; and

(b) one (1) paint booth identified as PB2S, with a maximum capacity of 0.83 trailer units per hour, with a maximum usage of chasis coatings ZPG-1017-OWNF and ZPG-20059 of 4.5 and 1.00 gallons per unit, respectively. The application method is by airless air atomization spray guns. The particulate matter from the over spray are controlled by panel filters, exhausting to a stack PB2.

D.1.1 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the spray booths shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2**,** the PM from the two (2) paint booths (PBS1 and PBS2) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this emissions unit and any control devices.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 3-6]

The Permittee is not required to test these emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Minor Permit Revision to a Minor Source Operating Permit (MSOP)

Source Background and Description

Source Name:	Wabash National Corporation (East Plant)
Source Location:	3460 McCarty Lane, Lafayette, Indiana 47905
County:	Tippecanoe
SIC Code:	3715
Operation Permit No.:	157-10976-00089
Notice Only Change No.:	157-14836-00089
Permit Reviewer:	SDF

The Office of Air Quality (OAQ) has reviewed an application from Wabash National Corporation relating to the following proposed changes to existing paint booths PB2S and PB1S:

(a) Paint Booth PB2S:

The proposed changes to paint booth PB2S include:

(1) transferring the booth from Building 7 to Building TDS,
(2) changing the parts coated from pup trailer parts to refurbished chasis trailer parts,
(3) changing the coatings to ZPG1017-OWNF and ZPG-20059, and
(4) increasing the amount of parts coated from 0.41 trailer units per hour to 0.83 units per hour.

(b) Paint Booth PB1S:

The proposed change to paint booth PB1S includes decreasing the amount of pup trailer parts coated in paint booth PB1S from 1.25 trailer units per hour to 1.04 trailer units per hour.

Source Definition

This source consists of two (2) plants:

(a) Plant 1 is located at 3550 East County Road 350 South, Lafayette, Indiana 47905 and

(b) Plant 2 is located at 3460 McCarty Lane, Lafayette, Indiana 47905.

Even though they are only 600 feet apart and source operates under common ownership and control and have the same SIC code, these sources operate independently of each other, each producing their own products and not functioning significantly as support facilities for each other. The McCarty Lane plant is determined to be a separate source from any other Wabash National plant. This is supported by language in the TSD for source determination for Title Vs 157-6070 and 157-7734. Therefore, McCarty Lane plant will be considered as a separate source.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
PB1	Painting	30.0	1.5	23,000	65
PB2	Painting	30.0	1.5	23,000	65

Enforcement Issue

There are no current enforcement actions associated with the proposed changes.

Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application.

An application for the purposes of this review was received on September 7, 2001.

Emission Calculations

UNRESTRICTED POTENTIAL TO EMIT (UPTE):

The emissions generated by the paint booths are volatile organic compounds, particulate matter (PM) and PM10, and hazardous air pollutants (HAP).

1. UPTE Prior to the Proposed Changes:

The unrestricted potential to emit (UPTE) prior to the proposed changes, as obtained from the MSOP TSD (157-10976-00089) are as follows:

PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Worst Case Single HAP	Comb. HAPs (tons/yr)
69.04	**69.04**	**-**	**-**	**75.65**	**-**	**7.25**	**9.60**

2. UPTE After the Proposed Changes:

The following calculations determine the PM, PM10, VOC and HAP UPTE based on use of the worst case coating, the respective maximum gal/unit, the maximum units/hr, the chemical properties of the coatings as obtained from the MSDS, emissions before controls, and 8760 hours of operation.

a. VOC Emissions:

VOC (lb/day) = lb/gal * fraction VOC * gal/unit * unit/hr * 24 hr/day
VOC (tons/yr) = lb/gal * fraction VOC * gal/unit * unit/hr * 8760 hr/yr * 1/2000 ton/lb

Paint Booth PB1S:

Coating	lb/gal	fraction VOC	maximum gal/unit	maximum unit/hr	VOC (ton/yr)
Gray Undercoating	12.00	0.199	3.00	1.04	32.63
Gray Paint	11.60	0.283	0.50	1.04	7.48
White Paint	12.60	0.208	0.50	1.04	5.97
Xylene	7.20	1.00	0.04	1.04	1.31
				Total	**47.39**

Paint Booth PB2S:

Coating	lb/gal	fraction VOC	maximum gal/unit	maximum unit/hr	VOC (ton/yr)
ZPG-1017-OWNF	10.10	0.218	4.50	0.83	36.02
ZPG-20059	10.80	0.030	1.00	0.83	1.18
				Total	**37.20**

b. PM/PM10 Emissions:

PM (tons/yr) = lb/gal * gal/unit * unit/hr * (1 - wt% VOC) * (1 - TE) * 8760 hr/yr * 1/2000

Paint Booth PB1S:

Coating	lb/gal	maximum gal/unit	maximum unit/hr	Fraction VOC	Fraction Transfer Efficiency (TE)	PM* (ton/yr)
Gray Undercoating	12.00	3.00	1.04	0.199	0.75	32.89
Gray Paint	11.60	0.50	1.04	0.283	0.50	9.49
White Paint	12.60	0.50	1.04	0.208	0.50	11.38
Xylene	7.20	0.04	1.04	1.00	0.75	0.00
					Total	**53.76**

Paint Booth PB2S:

Coating	lb/gal	maximum gal/unit	maximum unit/hr	Fraction VOC	Fraction Transfer Efficiency (TE)	PM* (ton/yr)
ZPG-1017-OWNF	10.10	4.50	0.83	0.218	0.75	32.41
ZPG-20059	10.80	1.00	0.83	0.030	0.75	3.87
					Total	**36.28**

* PM10 is determined to be equal to PM.

c. HAP Emissions:

The following table lists the HAP UPTE before and after the proposed changes:

	Xylene tons/yr	Ethylbenzene tons/yr	Butyl Cellosolve Acetate tons/yr	Diethyl Glycol Butyl Ether tons/yr	Combined HAPs tons/yr
After	**4.53**	0.88	0.58	1.18	**7.17**
Before	7.25	1.42	0.93	0.00	9.60
Due to Proposed Changes	-2.72	-0.54	-0.35	1.18	**-2.43**

The worst case single and combined HAP emissions after the proposed changes are determined to be 4.53 and 7.17 tons/yr, respectively. The proposed change will result in an overall reduction of 2.43 tons HAP/yr.

3. UPTE Due to the Proposed Changes:

The UPTE due to the proposed changes are the difference of the UPTE after and before the proposed changes.

	PM tons/yr	PM10 tons/yr	VOC tons/yr
After	90.04	90.04	84.59
Before	69.04	69.04	75.65
Due to Proposed Changes	**21.00**	**21.00**	**8.94**

EMISSION AFTER CONTROLS

The PM/PM10 emissions are controlled be dry filter systems with an overall control efficiency of 98.1%.

The following calculations determine the PM and PM10 emissions after controls.

PM(PM10) Emissions After Controls (tons/yr) = PM(PM10) Before Controls (tons/yr) * (1 - 0.981)

PM: 90.04 tons/yr * (1 - 0.981) = 1.71 tons PM/yr
PM10: 90.04 tons/yr * (1 - 0.981) = 1.71 tons PM/yr

All other emissions are uncontrolled.

The following table lists the source emissions after the proposed modification.

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Worst Case Single HAP (tons/yr)	Comb. HAPs (tons/yr)
After the Modification	1.71	1.71	-	-	84.59	-	4.53	7.17

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential To Emit (tons/year)
PM	21.00
PM-10	21.00
VOC	8.94

HAP's	Potential To Emit (tons/year)
Xylene	4.53
Ethylbenzene	0.88
Butyl Cellosolve Acetate	0.58
Diethyl Glycol Butyl Ether	1.18
TOTAL	7.17

(a) Since the PM, PM10, and VOC unrestricted potential to emit due to the proposed changes exceed the respective applicable levels under 326 IAC 2-6.1-6(g)(4)(A) and (B)(iii), respectively, and the single and combined HAP emissions after the proposed changes are less than 10 and 25 tons per year, respectively, the proposed changes shall be permitted as a minor permit revision.

(b) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in Tippecanoe County.

Pollutant	Status
PM-10	Attainment
SO_2	Attainment
NO_2	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Tippecanoe County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Tippecanoe County has been classified as attainment for rest of the criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Existing Source Status

Existing Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity):

Pollutant	Emissions (ton/yr)
PM	1.38
PM10	1.38
VOC	75.65
Single HAP	7.25
Combination HAPs	9.60

(a) This existing source is not a PSD major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

(b) This existing source is not a Part 70 major stationary source of hazardous air pollutants because the existing source single and combined HAP emissions are less than 10 and 25 tons per year, respectively.

Source Status After Modification

	Source Potential to Emit After Controls (tons/year)							
Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Worst Case Single HAP (tons/yr)	Comb. HAPs (tons/yr)
After the Modification	1.71	1.71	-	-	84.59	-	4.53	7.17
PSD Major Levels	250	250	250	250	250	250	-	-
Part 70 Major Levels	-	100	100	100	100	100	10	25

(a) The source after the modification is not a major PSD stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more and it is not one of the 28 listed source categories.

(b) This source after the modification is not a Title V major stationary source because no criteria pollutant potential to emit (PTE) exceeds the applicable level of 100 tons/yr, no single hazardous air pollutant PTE exceeds the applicable levels of 10 tons/yr, and the combined hazardous air pollutant PTE does not exceed the applicable level of 25 tons/yr.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

The source after the modification is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

(a) each criteria pollutant is less than 100 tons per year,
(b) each single hazardous air pollutant (HAP) is less than 10 tons per year, and
(c) the combined HAP emissions are less than 25 tons/year.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source after the proposed changes.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source after the proposed changes.

State Rule Applicability

326 IAC 2-6 (Emission Reporting):

Since the source CO, VOC, NO_x, PM-10, and SO_2 emissions are still less than 100 tons per year and the single and combined HAPs are less than the applicable levels of 10 and 25 tons per year, respectively, 326 IAC 2-6 still does not apply.

326 IAC 8-2-9 (Miscellaneous Metal Coating):

Paint Booths PB1S and PB2S shall still be subject to 326 IAC 8-2-9 because applicable metal parts are still applied to the surface of the mild steel parts of the truck trailers.

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the spray booths shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

In addition, the solvent sprayed from application equipment during cleanup or color changes shall still be directed into containers and closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the spray booths are still in compliance with this requirement.

The following calculations determine the as supplied VOC content of the coatings applied at this time (extreme performance coatings) based on the respective weight percent organics, and respective volume percent water.

lb/gal * Fraction Organics / (1 - vol% H2O)

Coating	Density lb/gal	Wt% Organics	1 - Vol. % H2O	lb VOC/gal. Less H2O	Limit lb VOC/gal. Less H2O
Gray Undercoat	12.00	0.199	1.000	**2.39**	**3.5**
Gray Paint	11.60	0.283	1.000	**3.28**	**3.5**
White Paint	12.60	0.208	1.000	**2.62**	**3.5**
Xylene	7.20	1.000	1.000	**7.20**	**-**
ZPG-1017-OWNF	10.10	0.218	1.000	**2.20**	**3.5**
ZPG-20059	10.80	0.030	0.654	**0.93**	**3.5**

326 IAC 6-3-2 (Process Operations):

Pursuant to 326 IAC 6-3-2 , the particulate matter (PM) from the paint booths PB1S and PB2S shall still be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$

Where: E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

326 IAC 2-4.1 (New Source Toxics Control):

The single and combined HAP UPTE from the painting booths are less than the applicable levels of 10 and 25 tons per year, respectively. Therefore, 326 IAC 2-4.1 still does not apply.

Changes Due to the Proposed Changes:

1. The equipment summary of Condition A.2 shall be changed as follows to reflect the changes proposed in this revision:

A.2 Emissions units and Pollution Control Equipment Summary

This source is approved to construct and operate the following emissions units and pollution control devices:

(a) one (1) paint booth identified as PB1S, with a maximum capacity of ~~1.25~~ **1.04** trailer units per hour, with a maximum usage of white paint, gray paint , undercoating**,** and the solvent of ~~3.75, 0.625, 0.625 and 0.05~~ **0.50, 0.50, 3.00, and 0.04** gallons per ~~hour~~ **unit**, respectively. The application method is by airless air atomization spray guns. The particulate matter from the overspray are controlled by panel filters, exhausting to a stack PB1; and

(b) one (1) paint booth identified as PB2S, with a maximum capacity of ~~0.41~~ **0.83** trailer units per hour, with a maximum usage of ~~white paint, gray paint, undercoating and the solvent of 1.23, 0.205, 0.205 and 0.0164~~ **chasis coatings ZPG-1017-OWNF and ZPG-20059 of 4.5 and 1.00** gallons per ~~hour~~ **unit**, respectively. The application method is by airless air atomization spray guns. The particulate matter from the overspray are controlled by panel filters, exhausting to a stack PB2.

The unit description shall be revised as follows to reflect the changes proposed in this revision.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

(a) one (1) paint booth identified as PB1S, with a maximum capacity of ~~1.25~~ **1.04** trailer units per hour, with a maximum usage of white paint, gray paint , undercoating**,** and the solvent of ~~3.75, 0.625, 0.625 and 0.05~~ **0.50, 0.50, 3.00, and 0.04** gallons per ~~hour~~ **unit**, respectively. The application method is by airless air atomization spray guns. The particulate matter from the over spray are controlled by panel filters, exhausting to a stack PB1; and

(b) one (1) paint booth identified as PB2S, with a maximum capacity of ~~0.41~~ **0.83** trailer units per hour, with a maximum usage of ~~white paint, gray paint, undercoating and the solvent of 1.23, 0.205, 0.205 and 0.0164~~ **chasis coatings ZPG-1017-OWNF and ZPG-20059 of 4.5 and 1.00** gallons per ~~hour~~ **unit**, respectively. The application method is by airless air atomization spray guns. The particulate matter from the over spray are controlled by panel filters, exhausting to a stack PB2.

Conclusion

The operation of the proposed changes to the paint booths will be subject to the conditions of this attached permit revision (157-14836-00089) and the existing minor source operating permit No. MSOP-157-10976-00089.